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VIA CM/ECF AND HAND DELIVERY

The Honorable Colm F. Connolly
J. Caleb Boggs Federal Building
844 N. King Street
Unit 31, Room 4124
Wilmington, DE 19801-3555

**Re: *Bristol-Myers Squibb Co., et al. v. Genentech, Inc.,*
(C.A. No. 17-cv-1027-CFC);
Bristol-Myers Squibb Co., et al. v. AstraZeneca Pharmaceuticals LP,
*et al. (C.A. No. 17-cv-1028-CFC)***

Dear Judge Connolly,

We write on behalf of the parties jointly pursuant to Paragraph 11 of the December 12, 2018 Scheduling Order. In accordance with the Scheduling Order, and in view of the fact that today is the deadline for Defendants to serve their Answering Claim Construction Brief, AstraZeneca respectfully requests permission to present expert testimony at the *Markman* hearing scheduled for May 29, 2019. AstraZeneca respectfully submits that expert testimony may aid the Court in its construction of the disputed terms. Plaintiffs do not believe expert testimony is necessary for the Court to resolve the pending claim construction issues, but to the extent the Court permits AstraZeneca to introduce expert testimony, Plaintiffs request the opportunity to potentially provide expert testimony in response.

The parties are available at the Court's convenience should Your Honor desire any elaboration regarding AstraZeneca's request to present expert testimony at the *Markman* hearing.

Respectfully submitted,

/s/ Daniel M. Silver

Daniel M. Silver (#4758)

cc: All counsel of record (via CM/ECF)